

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHINITA WASHINGTON, individually and on)
behalf of the classes defined herein,)
)
Plaintiff,)
)
v.)
)
RJM ACQUISITIONS, LLC,)
)
Defendant.)

Case No.: 08 CV 2825

Judge Aspen

**AGREED MOTION FOR AN ENLARGEMENT OF TIME AND TO RE-SET THE
INITIAL STATUS HEARING**

Defendant, RJM Acquisitions, LLC ("RJM") by and through its attorneys, David M. Schultz and Corinne C. Heggie pursuant to Rule 6 and for its Agreed Motion for an Enlargement of Time to file its responsive pleading to plaintiff's Complaint, states as follows:

1. On or about May 15, 2008, plaintiff filed a class action Complaint against defendant alleging that defendant violated the Fair Debt Collection Practices Act, ("FDCPA").
2. Defendant was served on or about June 2, 2008. Defendant's responsive pleading is due Monday, June 23, 2008. The court has set the initial status hearing for July 3, 2008 at 10:30 a.m.
3. Defense counsel has just been retained and needs additional time to analyze the issues in this matter, confer with its client and prepare the appropriate response. Defense counsel is contemporaneously filing an appearance with this motion.
4. On June 20, 2008, defense counsel discussed the additional time with counsel for the plaintiff and counsel for the plaintiff has no objection.
5. This time is not meant for the purpose of unnecessary delay and will not prejudice any party to the litigation.

6. The parties also request that the court re-set the parties' initial status hearing, currently set for July 3, 2008 at 10:30 a.m., to a date after the pleading date of July 14, 2008 defendant seeks herein.

WHEREFORE, Defendant, RJM Acquisitions, LLC, respectfully, requests that this Court grant it an additional 21 days, up to and including July 14, 2008, to file its responsive pleading to plaintiff's Complaint and that the court enter an order re-setting the parties' initial status hearing to a date following July 14, 2008.

Respectfully Submitted,

s/Corinne C. Heggie
One of the attorneys for
RJM Acquisitions, LLC

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